



ZOOM-ZOOM

February 09, 2018

Ms. Emily Su, Assistant Chief Counsel for Litigation and Enforcement
Office of Chief Counsel
National Highway Traffic Safety Administration
1200 New Jersey Ave, SE
Room W41-227
Washington, D.C. 20590

Subject: Notice of Anticipated Shortage and Request for Extension (“Extension Request”) for Priority Groups #5, #6, and #8 – Supplemental to December 15, 2017 Submission

Dear Ms. Su:

Mazda Motor of America, Inc. dba Mazda North American Operations (“Mazda”) respectfully submits this Extension Request for Priority Groups #5 and #6, as a supplemental to previously submitted requests on May 15, 2017, August 15, 2017, and December 15, 2017, and an initial submission for Priority Group #8 pursuant to the Third Amendment to the Coordinated Remedy Order (“ACRO”) Paragraph 39, sections (i) through (v).

Applicable models include the following:

- Priority Group #5: 2007-2009 MY B-Series, equipped with passenger side air bag inflators in Zone “A” as assigned by ACRO-Annex A
- Priority Group #6: 2007-2008 MY B-Series, equipped with passenger side air bag inflators in Zone “Non-A” as assigned by ACRO-Annex A.
- Priority Group #8: 2007-2008 MY B-Series, equipped with passenger side air bag inflators in Zone “C” as assigned by ACRO-Annex A
- Priority Group #8: 2009 MY B-Series, equipped with passenger side air bag inflators in Zone “B” as assigned by ACRO-Annex A.

Priority Group #8 is newly added from the previous submission on December 15, 2017. Further, no other Mazda vehicles in Priority Groups #5, #6, and #8 are affected by this submission. Additionally, a signed affidavit by a responsible company officer is included.

Please feel free to contact me if you have any questions.

Sincerely,

Rob Milne
Director, Takata Action Team
Mazda North American Operations

Cc: Arija Flowers, Trial Attorney for Litigation and Enforcement
Stephen Hench, Trial Attorney for Litigation and Enforcement

The affected models include:

- (1) 2007-2009 MY B-Series, equipped with passenger side air bag inflators in Zone “A” as assigned by ACRO-Annex A to Priority Group #5,
- (2) 2007-2008 MY B-Series, equipped with passenger side air bag inflators in Zone “Non-A” as assigned by ACRO-Annex A to Priority Group #6,
- (3) Newly added 2007-2008 MY B-Series, equipped with passenger side air bag inflators in Zone “C” as assigned by ACRO-Annex A to Priority Group #8, and
- (4) Newly added 2009 MY B-Series, equipped with passenger side air bag inflators in Zone “B” as assigned by ACRO-Annex A to Priority Group #8.

The following sections provide explanations in response to each of the specific concerns raised by the agency.

Paragraph 39, Section (i): Why sufficient supply deadline will not be met.

As Ford Motor Company (“Ford”) was lead engineering design and manufacturer of the 2007-2009 MY B-Series model equivalent to 2007-2009 MY Ford Ranger produced vehicles, Mazda is wholly dependent on Ford for design, development, validation, and supply of service parts, including air bag inflator replacements, to support Takata recalls. Ford has informed Mazda of a revised estimated time to provide replacement parts and, accounting for Mazda’s supply chain, a new estimate is set by June 2018 – reference Section (v), Table 2. The reasons stated for this timing are due to longer than anticipated development periods and subsequent validation requirements necessary to assure safe and proper operation of the replacement dual-stage, air bag inflators currently targeted to use a non-Phased Stabilized Ammonium Nitrate (“non-PSAN”) propellant produced and manufactured by Autoliv. Ford has confirmed that design, development, and validation of the replacement inflator has been completed with engineering approval to move forward to manufacture the part. The remedy replacement inflator is also confirmed to have started production validation which will be completed to support the start of manufacturing a sufficient quantity of parts to meet the requested extension date – reference Section (v) of this submission.

Paragraph 39, Section (ii): Remedy part selection, validation, development process used.

Mazda is following Ford's lead on the remedy part selection for recall replacement parts as Ford was lead engineering design and manufacturer of the 2007-2009 MY B-Series model equivalent to 2007-2009 MY Ford Ranger produced vehicles. Since the decision was made to use a non-PSAN based inflator propellant, a new company was selected as the designated supplier. Because the supplier is new, the process of design, development, validation, and manufacturing of service parts was restarted from the beginning and requires additional time to perform the necessary due diligence on assurance of the replacement parts safe function and operation. Ford can provide specific details upon request.

Paragraph 39, Section (iii): Steps taken to obtain sufficient supply.

Mazda continues to remain in close contact with Ford on timing for replacement parts availability since the ACRO was issued on December 9, 2016. Ford has provided the necessary information which Mazda has studied and utilized in making the decision to file this subsequent extension based on replacement parts supply availability. Should delays occur due to unforeseen circumstances, Mazda intends to offer free loaner vehicles for all owners/customers in the affected priority groups listed in Table 1 by the requested extension date. While this does not directly resolve the lack of parts in the short-term, Mazda is committed to the safety of our owners/customers and believes that alternate transportation will alleviate owners'/customers' immediate concerns. Mazda will also continue working in conjunction with Ford to assure a sufficient supply of remedy parts as quickly as possible to enable recall repairs.

Paragraph 39, Section (iv): How many replacement parts (number and percentage ready for launch).

The following table represents replacement parts anticipated to be available by the current Supply and Remedy Launch Deadline for Priority Groups #5, #6, and #8. “Affected Units” shown represents Zones “A”, “Non-A”, “B”, and “C” reported in NHTSA Recall No. 16V499 [dated June 30, 2016 and amended May 9, 2017 (for Priority Groups #5 & #6)] and NHTSA Recall No. 17V013 [dated January 10, 2017 and amended May 9, 2017 (for Priority Group #8)].

Table 1 – Priority groups, models, and replacement parts available by Supply and Launch Deadline.

Model Year(s)	P G	Make	Model	Position	Zone	Supply & Launch Deadline	Affected Units	*Number of Parts Available	*Percent Available at Launch
2007-2009	#5	Mazda	B-Series	Passenger	A	January 31, 2018 (from June 30, 2017) **	4,081	0	0%
2007-2008	#6	Mazda	B-Series	Passenger	Non-A	January 31, 2018 (from September 30, 2017)	957	0	0%
2007-2008	#8	Mazda	B-Series	Passenger	C	March 31, 2018	589	0	0%
2009	#8	Mazda	B-Series	Passenger	B	March 31, 2018	107	0	0%

**Note – Recall replacement parts availability provided by Ford Motor Company.*

Paragraph 39, Section (v): Specific extension request date.

Mazda formally requests an extension date not to exceed June 30, 2018 to launch all owner letter mailings for the affected B-Series vehicles as described in Table 2 below. Mazda anticipates receiving a sufficient supply of replacement parts from Ford during the month of June 2018 to support this owner letter mailing launch. Based on supply chains, redistribution processing time periods, and internal recall processing, Mazda anticipates launching the safety campaign by the requested extension date.

Table 2 – Remedy Launch Estimated Dates for Parts Availability and Owner Letter Mailings.

Model Year(s)	P G	Make	Model	Position	Zone	Supply & Launch Deadline	*Mazda Parts Availability	Owner Letter Mailings
2007-2009	#5	Mazda	B-Series	Passenger	A	January 31, 2018 (from June 30, 2017)	June 15, 2018	June 15, 2018
2007-2008	#6	Mazda	B-Series	Passenger	Non-A	January 31, 2018 (from September 30, 2017)	June 15, 2018	June 15, 2018
2007-2008	#8	Mazda	B-Series	Passenger	C	March 31, 2018	June 30, 2018	June 30, 2018
2009	#8	Mazda	B-Series	Passenger	B	March 31, 2018	June 30, 2018	June 30, 2018

**Note – Actual parts received from Ford, based on fulfillment records on past orders, have been generally behind from initial estimates and to which Mazda has accounted for in the parts availability dates listed. Should parts become available earlier than the requested extension date, Mazda intends to act immediately and launch owner letter mailings within 24 hours of receiving parts.*

Key Terms

Ford: Ford Motor Company

Mazda: Mazda Motor of America, Inc. dba Mazda North American Operations (MNAO)

Non-PSAN: The term used to represent other inflators that do not use propellant subject to the Takata “PSAN” based inflator recalls

PSAN: Abbreviation for phase-stabilized ammonium nitrate

AFFIDAVIT

I, Robert T. Davis, am the Senior Vice President, Special Assignments of Mazda Motor of America, Inc. dba Mazda North American Operations. I declare under penalty of perjury that I have undertaken and directed appropriate actions to assure that the answers provided in this submission are complete and correct, that I have directed the resources appropriately of Mazda Motor Corporation and Mazda Motor of America, Inc. dba Mazda North American Operations to be utilized diligently for information and responsive in requesting this Notice of Anticipated Shortage and Request for Extension (“Extension Request”) for Priority Groups #5, #6, and #8, as required in the Third Amendment to the Coordinated Remedy Order (ACRO), Paragraph 39, and that, to the best of my knowledge, the answers to the inquiries provided to NHTSA respond completely and correctly to this “Extension Request.”

Executed on February 09, 2018 at Irvine, California.



Robert T. Davis
Senior Vice President, Special Assignments
Mazda North American Operations